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May 13, 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna Searcy
Secretary
Federal Communications Commission
1919 M Street NW, Room 222
Washington, DC 20554

Re: PR Docket No. 92-235

Dear Ms. Searcy:

The Metropolitan Atlanta Rapid Transit Authority (MARTA) owns, operates, and maintains over 2,500 UHF mobile and portable two-way radios, 150 base stations, and an additional 50 satellite receivers. This radio communications equipment is used primarily to provide operational safety, maintenance, and police security for the property and patrons of the MARTA bus and heavy rail public transportation systems. Along with command and control equipment, towers, and transmission systems (coaxial cables, radiax cables, and antennas), radio communications represents quite a large investment of public funds. As an example, we are currently performing acceptance testing on a new voice and data bus communications system which will cost over \$6 million. It is expected that this new system will be fully operational later this year. Another example is the millions of dollars invested in infrastructure and transmission systems to provide reliable communications in tunnels and other underground facilities for train operations, maintenance, and security personnel. This coverage will be in jeopardy if MARTA radio systems are modified to meet PR 92-235 requirements.

While we have not had the luxury of time to research in detail all of the technical ramifications of PR 92-235, we have tried to stay abreast of industry and media coverage of comments and observations concerning the UHF (450 MHz) portion of the frequency spectrum. We have also attempted to determine the impact of the proposed 1996 requirements (reduced transmitter deviation and power) on all MARTA communications systems. This analysis, along with our concern that the Commission staff may have overlooked some of the effects of the proposed changes, has led us to express our concerns to the Commission.

We do not take issue with the need for improved spectrum efficiency; however, we feel strongly that the January 1, 1996, deadline for compliance with the 12.5 kHz channel spacing and the reduction in ERP (and/or antenna height) is unrealistic. To meet the proposed standards will require considerable and costly redesign and modification of all existing MARTA systems including the new bus system mentioned above. Far more will be required than simple transmitter deviation and power adjustments.

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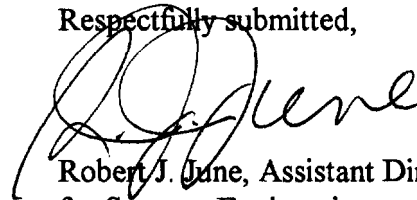
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Coverage studies will be necessary to determine where additional sites will be required to maintain systemwide coverage. Additional sites will have to be designed, specified, bid, and installed. Over 2,500 mobile and portable radios and 150 base stations will need to be modified.

We urge the Commission to reevaluate the following impacts due to the proposed rule changes:

1. The technical feasibility of operating existing FM equipment at 3 kHz deviation versus 5 kHz deviation; and
2. The planned timetable for implementation of the Proposed Rules.

Respectfully submitted,



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for Systems Engineering
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Authority
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RJJ/RJJ:lpr